

EXHIBIT 32

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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MARK I. SOKOLOW, et al.,

PLAINTIFFS,

-against- Case No:
04CV397 (GBD) (RLE)

THE PALESTINE LIBERATION ORGANIZATION, et
al.,

DEFENDANTS.
-----X

DATE: September 4, 2012
TIME: 3:21 P.M.

DEPOSITION of the Plaintiff,
RENA SOKOLOW, taken by the Defendants,
pursuant to Notice and to the Federal Rules
of Civil Procedure, held at the offices of
Morrison & Foerster, 1290 Avenue of the
Americas, New York, New York 10104, before
Robert X. Shaw, CSR, a Notary Public of the
State of New York.

1 Rena Sokolow

2 and think of something, can I tell my
3 lawyer?

4 Q. Absolutely. If you think of
5 anything before you leave, tell us also.

6 A. Right.

7 Q. I will ask you some questions
8 about the attack itself. I will move to a
9 different subject.

10 I understand that you and your
11 husband and Jamie and Lauren were in
12 Jerusalem, and there was an explosion, and
13 the four of you were injured; correct?

14 A. Correct.

15 Q. I understand that your other
16 daughter, Elana, was not present; is that
17 correct?

18 A. Correct.

19 Q. Did you see the person or
20 persons who set off the explosion before
21 the explosion?

22 MR. SOLOMON: Before the
23 explosion.

24 A. Before the explosion? No.

25 Q. Okay. Do you know from which

1 Rena Sokolow

2 direction the explosion came, for example,
3 do you know if it came from behind you?

4 A. I know only because someone who
5 witnessed her blow herself up told me this.

6 Q. So someone else saw the person
7 who exploded?

8 A. Saw the person and saw me.

9 Q. Okay. But you did not see the
10 person who exploded at the time that it
11 exploded?

12 A. No.

13 Q. So, do you have a sense, based
14 on your own injury, or your own
15 recollection, whether the explosion
16 occurred behind you or in front of you?

17 A. I was told that she was behind
18 me.

19 Q. Okay. You did not actually see
20 the explosion when it took place?

21 A. No.

22 Q. Do you believe that you can
23 identify the person who set off the
24 explosion?

25 A. I don't understand the

1 Rena Sokolow

2 question.

3 Q. All right. Well, I mean, in
4 any crime, for example, one of the issues
5 is who the perpetrator is, and you go
6 through a process of trying to identify
7 that person.

8 Do you think that you can
9 identify the person who set off the
10 explosion in which you were injured?

11 A. Yes.

12 Q. How do you think that you can
13 identify the person that set off the
14 explosion?

15 A. Well, I have seen her pictures
16 all over newspapers, magazines, the
17 Internet.

18 If someone showed me a picture
19 of Wafa Idris, I would know that she was
20 the one that did this.

21 Q. Would you know that because you
22 have seen pictures of this person in the
23 media?

24 A. Yes.

25 Q. Do you remember seeing this

1 Rena Sokolow

2 person on the day you were injured?

3 MR. SOLOMON: At all.

4 A. I remember seeing her head
5 lying on the floor.

6 Q. Now, when did you see the head
7 lying on the floor?

8 A. While I was sitting in a pool
9 of blood, with my leg in four different
10 directions, I looked over to my right, and
11 I saw a woman's head with her hair all
12 burnt, and that is what I saw.

13 Q. I have seen something in the
14 documents where you wrote something
15 indicating that you thought this might be
16 the head of a mannequin.

17 MR. SOLOMON: Do you want to
18 mark that document?

19 A. Yes.

20 MR. HILL: I will ask the
21 question first.

22 Q. Do you remember writing
23 something where you indicated that you
24 believe you saw a mannequin head?

25 A. I do. I remember saying to

1 Rena Sokolow

2 myself that it had to be a mannequin,
3 because after the event, I was told that
4 only one person died, and it was a man.

5 So, therefore, the head that I
6 saw had to be fake, and then I found out
7 that it was a female suicide bomber.

8 So then I realized that the
9 head was what I saw.

10 MR. SOLOMON: Off the record.

11 (Whereupon, an off-the-record
12 discussion was held.)

13 A. But there were no stores nearby
14 that had mannequins in the window.

15 It was a shoe store. There
16 were, there was nothing that would have had
17 a mannequin flying out the window.

18 Q. And do you believe that, based
19 on seeing this head, that you can identify
20 whose head it was?

21 A. No.

22 Q. So, when you say you think you
23 can identify the person who did it, is it
24 fair to say that that is based on what you
25 have read about the attack?

1 Rena Sokolow

2 A. Yes. And based on what the
3 woman who saw herself blow herself up told
4 me.

5 Q. Okay. So, when you say you
6 think that you could identify the person
7 who detonated the bomb, that is based on
8 what someone else told you and what you
9 read in the media; correct?

10 A. Yes.

11 Q. You don't think that based on
12 viewing this head, that you could identify
13 whose head that was; correct?

14 A. Correct.

15 Q. Okay. Do you know if your
16 husband, Mark, will require any future
17 medical treatment for the injuries that he
18 sustained in January of 2002?

19 MR. SOLOMON: Objection.

20 Again, you are here as a fact
21 witness, you are not a medical
22 expert.

23 So when you answer this
24 question, only to your personal
25 knowledge. Okay?

1 Rena Sokolow

2 attack that you were injured?

3 A. No.

4 Q. Are you aware of any evidence,
5 other than what you consumed in the media
6 in some form, that Wafa Idris traveled to
7 Jerusalem in a Palestinian ambulance?

8 A. No.

9 Q. This may be obvious, but I am
10 asking to make sure.

11 Are you aware of any evidence,
12 other than what you have consumed from some
13 media outlet, that the PA had anything to
14 do with the bombing in which you were
15 injured?

16 A. No.

17 Q. A similar question: Are you
18 aware of any evidence, other than what you
19 have gleaned from some media source, that
20 the PLO had anything to do with the attack
21 in which you were injured?

22 A. No.

23 MR. HILL: Why don't we take a
24 quick break and I can get myself
25 organized.

1 Rena Sokolow

2 A. Yes. And based on what the
3 woman who saw herself blow herself up told
4 me.

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6 think that you could identify the person
7 who detonated the bomb, that is based on
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